

WA 2917  
5-29-85



Governor

Director

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4350-150th Ave. N.E. • Redmond, Washington 98052 • (206) 885-1900

FILE COPY

Mr. Ronald S. West, President  
Chemical Processors, Inc.  
5501 Airport Way South  
Seattle, Washington 98108

Dangerous Waste ID No. WAD000912917

Dear Mr. West:

This letter is to confirm the Compliance Inspection of the Resource Conservation and Recovery Act (RCRA) WAC 173-303 for your company's Pier 91-Seattle facility on April 9, 1985.

The United States Environmental Protection Agency is conducting periodic oversight RCRA inspections in authorized states to help assess the adequacy of the state's implementation of its hazardous waste program. The USEPA RCRA inspectors who accompanied me were Mr. Andy Boyd and Mr. Wayne Pierre.

I have received a copy of your company's Security Policy at the Pier 91 facility from Mr. Stefani.

During the inspection, two issues were raised which need to be commented on.

1. Adequate closure costs WAC 173-303-620. You have an updated closure cost file. The question: is the amount of approximatey \$24,000 adequate?

My understanding from the discussion was that you plan to leave the tanks at the site clean. The closure cost estimates are those that cover the removal of all materials, cleaning of the pipes used for transferring materials from truck to holding tanks and the property surfaces.

2. Records requirements refer to WAC 173-303-210 and 380.

We appreciate your efforts in the handling of waste materials and we would like to commend you and your company's interest in providing no cost service to the

USEPA RCRA



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RECEIVED  
JUN 3 1985  
WASTE MANAGEMENT BRANCH

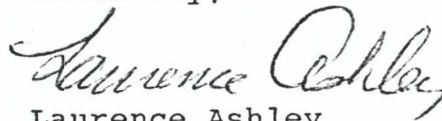
Mr. Ronald S. West  
May 29, 1985

page 2

general public in waste mangement.

Enclosed is a checklist of the RCRA inspections. If you have any question, please call me at 885-1900.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laurence Ashley".

Laurence Ashley  
RCRA Inspector  
Environmental Quality

Enclosure

RCRA/WAC 173-303 DANGEROUS WASTE  
COMPLIANCE CHECKLIST/QUESTIONNAIRE

Industry name and address:

Chemical Processors, Inc  
Pier 91  
Seattle

Date:

April 19, 1985

EPA/State Identification Number:

WAD000812917

County: King

Zip: 98104

Telephone: (206) 767-0350

Physical Location of Facility (if different than above): \_\_\_\_\_

Facility Contact(s) Present During Inspection		
Name	Title	Phone No.
Bob Moody	Manager	(206) 284-2450
Denise Stefani	Manager, RCRA	(206) 767-0350
Ron West	President	(206) 767-0350

Inspected by:

Laurence Ashley (206) 885-1900  
(Printed) (Phone Number)

I. Notification, Part A and Core Information

1. Notification filed: yes
2. Part A application filed: yes
3. Classified as: Generator \_\_\_\_\_  
Transporter \_\_\_\_\_  
Treatment facility \_\_\_\_\_  
Storage facility \_\_\_\_\_

Date: August 13, 1980

Date: May 1, 1984 - Revised

Disposal facility \_\_\_\_\_  
Transfer facility \_\_\_\_\_  
Recycler \_\_\_\_\_  
Other \_\_\_\_\_

Comments: \_\_\_\_\_



4. Have any changes in Notification or Part A been filed? Yes Date(s): December 7, 1984
5. Does facility generate a solid waste(s) or receive a solid waste as defined by WAC 173-303-040? Yes
6. Is this waste(s) designated under WAC 173-303, and not RCRA? No
7. Under what section, in WAC 173-303, are waste(s) designated?
- a. Discarded Chemical Products (081) ✓
  - b. Dangerous Waste Sources (082) \_\_\_\_\_
  - c. Dangerous Waste Mixtures (084) \_\_\_\_\_
  - d. Toxic Dangerous Wastes (101) \_\_\_\_\_
  - e. Persistent Dangerous Wastes (102) \_\_\_\_\_
  - f. Carcinogenic Dangerous Wastes (103) \_\_\_\_\_
  - g. Dangerous Waste Characteristics (090) \_\_\_\_\_
    - (1) Ignitability \_\_\_\_\_
    - (2) Corrosivity \_\_\_\_\_
    - (3) Reactivity \_\_\_\_\_
    - (4) EP Toxicity \_\_\_\_\_

Remarks: The facility recycles oil  
Pre-treats waste liquid (H<sub>2</sub>O) and disposal  
of H<sub>2</sub>O through - Permit with METRO #7099

8. Dangerous Wastes listed on Part A application, or for generators, dangerous wastes generated.

	<u>D.W. No.</u>	<u>Amount</u>	<u>Waste Description</u>	<u>Disposal Method</u>
a.	<u>See Annual Report</u>			
b.	_____	_____	_____	_____
c.	_____	_____	_____	_____
d.	_____	_____	_____	_____
e.	_____	_____	_____	_____
f.	_____	_____	_____	_____
g.	_____	_____	_____	_____

9. Have these wastes been analyzed for determination of degree of hazard? Yes

If so, by whom?

Chemical Processor / Landfills /  
Generators.

10. Has facility petitioned, through RCRA 260.22 or WAC 173-303-910(3), to remove designation from a waste? No

If yes, explain:

11. This facility: ☒ Complies ☐ Does not comply with Interim Status Standards.

Comments:

METRO Permit #7099 is under  
change to new renewal date  
present date of expiration - 8/29/1994  
working with METRO to update.

Records are not all together for  
period specified - Three years.  
Company explained records at main  
office.

Security - Company gave format  
May 8, 1985 inspection of ~~the~~ <sup>the</sup>  
George town Plant.

Signature of Inspector:

Laurence Bailey

II. Standards Applicable to GENERATORS of Dangerous  
Waste - RCRA 262/WAC 173-303-170 to 230

1. Does generator transport its own waste?

Yes No

☒

a. Is waste ever given to "outside" contractor?

EPA/State I.D. No: WADOG1672312

(Contractor(s))

Name and address:

Resource Recovery Corp.

Note: (If facility transports own waste, look at standards applicable to transporters, section III)

2. Is generator following RCRA/WAC 173-303 manifest system?

☒

a. Is signature of, and date of acceptance by transporter obtained prior to transport?

b. Does generator retain one copy of manifest in accordance with WAC 173-303-180(3), Manifest Procedures?

c. Are manifests (signed by the generator, transporter, and designated disposal facility) kept for a minimum of three years (WAC 173-303-210(1))?

3. Does generator operate a specific area for container handling or storage?

☒

If yes, describe:

Tank farm

a. Does generator comply with the requirements set forth in WAC 173-303-200 governing on-site waste accumulation:

(1) Labeling and marking

(2) Dating

(3) Inspections (must be done weekly for containers) WAC 173-303-530(8)?

☒



- |  | <u>Yes</u>                          | <u>No</u>                |
|--|-------------------------------------|--------------------------|
| b. Are incompatible wastes or other materials segregated?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Is entity familiar with Generator Reporting Procedures, (WAC 173-303-220)?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a. Annual Reports (WAC 173-303-220(1))   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Exception Reports (WAC 173-303-220(2))  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Spills and Discharges into the Environment (WAC 173-303-145)  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Is generator aware of and complying with regulations concerning the preparation of Dangerous Waste for transport? |                                     |                          |
| a. Packaging: 49 CFR 173, 178, 179, and with requirements of UTC and WSP   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Labeling: 49 CFR 172  | <input type="checkbox"/>            | <input type="checkbox"/> |
| c. Marking: 49 CFR 172   | <input type="checkbox"/>            | <input type="checkbox"/> |
| d. Placarding: 49 CFR 172 Subpart F  | <input type="checkbox"/>            | <input type="checkbox"/> |

NOTE: Containers with < 110 gallons of Dangerous Waste must be marked with the following or essentially equivalent, words and information, displayed in accordance with 49 CFR 172.304:

**DANGEROUS WASTE** -- State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the U.S. Environmental Protection Agency.

Generator's Name and Address

Manifest Document No. \_\_\_\_\_

Comments:

0.1 / waste waste treatment facility

6. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered (WAC 173-303-120)?

\_\_\_\_\_ ✓ \_\_\_\_\_

a. If yes, what are they? \_\_\_\_\_

- b. Do they exhibit any of the Dangerous Waste characteristics?

\_\_\_\_\_

Note: If not, they are regulated.

7. Does generator store dangerous waste over 90 days for either transport, treatment or disposal?

\_\_\_\_\_ ✓ \_\_\_\_\_

If yes, what are they? Storage Facility

(if yes, go to IV, Standards for TSD Facilities)

8. Does generator follow the operating procedures for containers as outlined in WAC 173-303-160, containers?

\_\_\_\_\_

i.e. Triple rinsing, resulting in less than 1% volume or 1 inch product remaining.

9. Preparedness and Prevention (WAC 173-303-200(6)).

- a. Is an emergency communication system readily available in areas where wastes are stored or handled (WAC 173-303-340)?

\_\_\_\_\_ ✓ \_\_\_\_\_

- b. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment readily available (WAC 173-303-340(1)(c))?

\_\_\_\_\_ ✓ \_\_\_\_\_

- c. Have arrangements been made with local police, fire departments, and emergency response teams to familiarize them with the facility layout and the properties of the dangerous wastes handled (WAC 173-303-340(4))?

\_\_\_\_\_ ✓ \_\_\_\_\_

Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



10. Contingency Plan and Emergency Coordinator  
(WAC 173-303-200(6)).

- a. Does the facility have a Contingency Plan which is designed to minimize the consequences of any unplanned release of Dangerous Waste (WAC 173-303-350)? ☒
- b. Does the facility have an Emergency Coordinator, and if so, their name Bob Moody ☒
- c. Is this Emergency Coordinator, or his designee, familiar with the requirements stated in WAC 173-303-360, Emergencies? ☒
- d. Does contingency plan contain a list of all emergency equipment, its location(s), and a brief outline of its capabilities (WAC 173-303-350(3)(e))? ☒

If not, explain: \_\_\_\_\_

11. Personnel Training (RCRA 262.34(a)(5))

- a. Does facility have a training program that instructs facility personnel in such a way that ensures compliance with RCRA and WAC 173-303? ☒
- (1) Do facility personnel participate in an annual review of the training provided in the training program? ☒
- (2) Does the program include training in the following areas, where applicable?
- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment. ☒
- (b) Key parameters for automatic waste feed cut-off systems. ☒
- (c) Communications or alarm systems. ☒
- (d) Response to fire or explosions. ☒
- (e) Response to ground water contamination. ☒
- (f) Shut down of operations. ☒

Yes      No

b. Does facility have a written training plan which includes the following documents and records:

- (1) For each position related to dangerous waste management; the job title, job description (including qualifications), and the name of the employee.
- (2) A written description of the type and amount of both introductory and continuing training for that position.
- (3) Records documenting that facility personnel have received and completed the training required by WAC 173-303-330.

Comments:

RCRA/WAC 173-303 DANGEROUS WASTE

COMPLIANCE CHECKLIST/QUESTIONNAIRE

IV. Standards Applicable to Dangerous Waste TREATMENT, STORAGE and DISPOSAL Facilities, WAC 173-303-280 to 395

Yes No

1. Has facility obtained an EPA/state identification number? ☒ Yes ☐ No
2. Are dangerous wastes accepted from "outside" sources (wastes not generated on site)? ☒ Yes ☐ No
  - a. If yes, has a chemical and physical analysis of a representative sample been obtained in accordance with RCRA 265.13 and WAC 173-303-300? ☒ Yes ☐ No
  - b. Does the facility confirm that each Dangerous Waste received at the facility matches the identity of the waste on the manifest? ☒ Yes ☐ No
3. Has facility obtained a detailed chemical, physical, and/or biological analysis of his waste prior to storing, treating, or disposing of it (WAC 173-303-300(2))? ☒ Yes ☐ No

Describe: from generator.

4. Does the facility follow a Written Waste Analysis Plan containing:
  - a. Parameters to be tested? ☒ Yes ☐ No
  - b. Methods of analysis? ☒ Yes ☐ No
  - c. Methods to obtain representative samples? ☒ Yes ☐ No
  - d. Testing frequency? ☒ Yes ☐ No

Comments:

Three years of records were not  
at the facility - They are located  
at the main office.



Yes No

5. Security

a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? ✓

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by any approach?       

(2) Are they legible from a distance of 25 feet or more?       

(3) Does the facility have a 24-hour surveillance system  
or  
Artificial or natural barrier/or combination of both, to control access to the active portion?       

6. Are incompatible wastes segregated to ensure against accidental ignition, fuming, etc. (WAC 173-303-395)? ✓

a. Are ignitable or reactive wastes kept a minimum of 50 feet away from the site property line?       

b. Is this compliance with WAC 173-303-395 documented in the operating record?       

c. Are yearly inspections carried out where ignitable or reactive wastes are stored?       

d. Is their inspector familiar with the Uniform Fire Code,  
or  
is he a local, state, or Federal Fire Marshal?

Seattle Fire Marshal

Comments:

The facility is under the security  
system that the Port of Seattle provides  
They have a system "inhouse" to protect outsiders  
from coming into their operations without notice.

Yes No

7. Has the facility a written inspection schedule (RCRA 265.15/WAC 173-303-320(2))?

☒ Yes ☐ No

a. Does it include inspecting all:

Monitoring equipment?

☐

Safety and emergency equipment?

☐

Security devices?

☐

Detection equipment?

☐

Dangerous waste storage areas?

☐

b. Is this inspection schedule maintained at the facility?

☒

c. Is an inspection log maintained?

☒

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection?

☐

8. Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (RCRA 265.73/WAC 173-303-380)?

☒

b. Does the record contain the following information:

(1) A description of, and the quantity of each Dangerous Waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility?

☒

(2) The location of each Dangerous Waste within the facility, and its quantity?

☒

(3) A map showing disposal sites?

☒

(4) Summary reports and details of all incidents that require implementing the Contingency Plan?

☒

Comments:

Operating Record (Continued)

Yes No

(5) Records and results of inspections as required by WAC 173-303-360(2)(d), General Inspection (need only be kept three years)?

✓

(6) All closure and post-closure cost estimates required for the facility?

✓

(7) The results of testing and waste analysis?

✓

9. Facility Reporting Procedures (WAC 173-303-390)

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to the WDOE by March 1 of each year?

✓

(The report form and instructions in Facilities Report Form - Part B must be used for this report, and is available from the department.)

b. Is owner/operator familiar with requirements for unmanifested reports, if applicable?

c. Is owner/operator familiar with procedures for emergencies (WAC 173-303-360(2))?

10. Closure and Post-Closure

a. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility (RCRA 265.112)?

✓

Does it contain the following:

(1) A description of how and when the facility will be partially closed (if applicable) and finally closed?

(2) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?

(3) A description of the steps needed to decontaminate the facility equipment during closure?

Comments:

Item 10 - They have a \$24,000 figure for closure - is this ~~at~~ enough?



11. Financial Requirements (RCRA 265.140)

a. Has owner/operator prepared a written estimate of the cost of closing the facility in accordance with the closure plan (RCRA 265.112)?

☒

(1) Is this cost estimate annually adjusted?

\_\_\_\_\_

b. Has owner/operator established financial assurance for the closure of the facility (RCRA 265.143)?

☒

(1) By what method has this been achieved:

- a. Trust fund
- b. Surety bond
- c. Letter of credit
- d. Insurance
- e. Financial test or corporate guarantee
- f. Multiple mechanisms

☒  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

if so, state methods used \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

(2) Has owner/operator submitted a copy of financial assurance to Regional Administrator (or WDOE)?

☒

(3) Is wording of the financial assurance statement identical to that specified in RCRA 264.151 (a) (1) Trust fund

- (b) Surety bond
- (c) Letter of credit
- (d) Insurance
- (e) Financial test
- (f) Corporate guarantee
- 265.143 (g) Multiple Financial Mechanism

☒  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Note: (Ask for copy of assurance statement if department does not have one.)

c. Has the owner or operator of the Hazardous Waste treatment storage, or disposal facility obtained and maintained liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million?

☒

Yes No

- d. Has the owner or operator of the Hazardous Waste treatment, storage, or disposal facility obtained and maintained liability insurance for nonsudden occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million?

✓

12. Financial Requirements for Post-Closure Care (RCRA 265.144)  
(Disposal Facilities Only)

- a. Has owner/operator prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (RCRA 265.144)?

✓

(1) Is this cost estimate annually adjusted?

✓

- b. Has owner/operator established financial assurance for the post-closure care of the facility (RCRA 265.145)?

✓

(1) By what method has this been achieved:

- a. Trust fund  
b. Surety bond  
c. Letter of credit  
d. Insurance  
e. Financial test or corporate guarantee  
f. Multiple mechanisms

✓  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

if so, state methods used

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Comments:

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\_\_\_\_\_  
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\_\_\_\_\_

Yes No

(2) Has owner/operator submitted a copy of financial assurance to Regional Administrator (or WDOE)?

(3) Is wording of the financial assurance statement identical to that specified in RCRA 264.151 (a) (1) Trust fund

(b) Surety bond

(c) Letter of credit

(d) Insurance

(e) Financial test

(f) Corporate guarantee

265.145 (g) Multiple Financial Mechanism

(4) Has owner/operator satisfied the financial assurance requirements by using a mechanism that takes into account both closure and post-closure care (RCRA 265-140)?

if so, state method(s) used

Trust fund

Comments:



13. Management of Containers (RCRA 265.170/WAC 173-303-630,  
Final Status)

- a. Are container storage areas inspected weekly for leaks and container deterioration (RCRA 265.174)? ✓
- b. If systems are uncovered, do they have positive drainage control and sufficient capacity to contain 110 percent of the volume of the largest container, (final status)?
- c. If the facility stores EHW, is it protected from the elements by means of a building or other protected covering (final status)?
- d. Are containers marked or labeled in a manner equivalent to 49 CFR 172 subpart E?

Comments:

14. Tanks (RCRA 265.190)

Yes No

a. Do tanks on the facility hold DW or EHW?

✓

If so, what are their contents? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. If applicable, are tanks protected from accelerated corrosion, erosion, or abrasion through the use of:

Inner liners

Coating

Other

\_\_\_\_\_  
✓\_\_\_\_\_  
\_\_\_\_\_

c. Are Dangerous Waste storage tanks operated in a manner which minimizes the possibility of overfilling?

How:

Waste feed cut-off

Bypass system to another tank

High level alarm

Other \_\_\_\_\_

✓\_\_\_\_\_  
✓\_\_\_\_\_  
✓\_\_\_\_\_

d. Are tanks used for holding Dangerous Waste inspected on a routine basis (RCRA 265.194)?

For:

Overfilling equipment

Monitoring equipment

Tank integrity (above ground)

✓ once/day  
✓ once/day  
✓ once/week

e. Are tanks cleaned of all dangerous waste prior to being taken out of service or re-use?

✓

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## NARRATIVE INSPECTION REPORT

Resource Conservation and Recovery Act (RCRA) WAC173-303  
Compliance Inspection

Facility: Chemical Processors, Inc.  
Pier 91  
Seattle, Washington

Inspection Date: April 9, 1985

ID Number: WAD000812917

Inspector: Laurence Ashley

Oversight USEPA RCRA Inspectors: Andy Boyd and Wayne Pierre

Purpose: This inspection was intended to supply information of facility compliance with applicable hazardous waste requirements under WAC 173-303 and 40 CFR part 265.

### General Facility and Process Information

The facility's main functions are:

- Oil recovery and recycle

- Industrial Waste Water Treatment

- Other types as listed: F017, F018, K049

- K050, K051, K052, U188, P110, U051, U052

- U053, U197, D001, D002, D000 Toxic.

### Notification and Permitting

For information see checklist dated April 9, 1985.

### Facility Inspection - Opening Conference

We met in Mr. West's office located in the main office building for Chemical Processors, Inc.. Others from Chem-Pro were Mr. Dennis Stefani and Rick Morton. Mr. David Goto from the Boeing Company. Mr. Boyd and Mr. Pierre from USEPA. Mr. Ashley from WDOE. Mr. Pierre opened by explaining why USEPA was present and the general purpose of the inspection. He explained that WDOE was the lead during the inspection. Mr. West introduced his staff members and Mr. Goto. Mr. West explained that because of Western Processing issue and the fact that the Boeing Company sends a large amount of their wastes to Chem-Pro, they have chosen to send one of their people to oversight inspections. Mr. Goto is from Boeing's RCRA group. After the plan for the inspection was decided, we went to the facility at Pier 91. We inspected the site and records while there.



## Facility Inspection - General

See attached facility map.

See annual report for 1984.

The used oil received and checked for PCB if there is a question. The generator supplies an analytical report. The material is sent through the oil separator and stored. The oil is analyzed when the holding tank is filled. This will tell how the oil will be recycled. The water and sludge from the separator is analyzed which will tell how they will be treated and disposed of.

The industrial waste water is analyzed by the generator before delivery. The report is used to determine where in the facility the shipment will go. Chem-Pro spot checks shipments that are questioned or new. They look for cyanides, pH, and phenols. The waste water is stored in tanks until treatment or shipment to Chem-Security. The holding tanks are in units that are bermed to 110% of all tanks within the unit.

The other materials that come into the facility are examined and separated into usable and unusable units. The unusable units are sent to Chem-Security.

The holding tanks all have covers. The ground is protected throughout the site by a ground cover except the SE corner tank unit. Catch basins are located throughout the operational area.

They maintain a manifest file, analytical file and a generator's file. The wastes are analyzed by the generator or by Chemical Processors own laboratory. The facility has a permit with METRO for discharging to METRO and a permit with SEattle/King County for disposal of approved materials.